

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
(Eastern Division)

CHARLES C. JOHNSON and	:
GOT NEWS, LLC	: Case No. 14:15-cv-01137 (CAS)
Plaintiffs,	:
v.	:
GAWKER MEDIA, LLC, J.K. TROTTER,	:
and GREG HOWARD	:
Defendants.	:

CONSENT MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO MOTION FOR STAY (DOC. 62) AND
MOTION FOR DISCOVERY (DOC. 65).

Defendants Gawker Media, LLC, J.K. Trotter, and Greg Howard (together, “Defendants”), by and through their undersigned counsel, move for an 18 day extension of time, through and including Friday, January 15, 2015, for filing their response to Plaintiffs’ Motion for Stay (Doc. 62) and Motion for Discovery (Doc. 65). In support of this Motion, Defendants state:

1. On December 18, 2015, after briefing on all pending motions had concluded, Plaintiffs filed their Motion for Stay (Doc. 62). On December 21, 2015, Plaintiffs filed their Motion for Discovery (Doc. 65). Collectively, the motions seek an order from the Court staying determination on Defendants’ California Anti-SLAPP Motion to Dismiss pending discovery and permission to undertake such discovery.

2. Under E.D.Mo L.R. 7-4.01, Defendants’ responses to the Motions are due Monday, December 28, 2015 and Wednesday, December 31, 2015, respectively.

3. Defense counsel, both St. Louis and District of Columbia, will be on vacation from December 24, 2014 through January 4, 2015.

4. Given that Plaintiffs' two motions seek essentially the same relief, Defendants anticipate filing a single response. Defendants request until January 15, 2015 to file a response.

5. Counsel for Plaintiffs has consented to this Motion.

6. A proposed Order is attached hereto and submitted in Word format to MOED_Proposed_Orders@moed.uscourts.gov, as required by the CM/ECF Manual.

WHEREFORE, Defendants move the Court for an extension of time through and including Friday, January 15, 2016 to file their response to Plaintiffs' Motions for Stay and Discovery. (Docs. 62 and 65).

Respectfully submitted,

LEWIS RICE LLC

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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on this 22nd day of December, 2015, a copy of the above and foregoing document was served via the Court's electronic filing system:

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By: /s/ Joseph E. Martineau

